

United States Courts
Southern District of Texas
FILED

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

May 15, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

§
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§
§

CRIMINAL NO. 4:25-cr-00251

v.

JAVIER ALFONSO NUNEZ SUAREZ

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Theft of Government Property, 18 U.S.C. § 641)

Beginning in or about February 2, 2016, and continuing through on or about May 15, 2025, in the Southern District of Texas and elsewhere,

JAVIER ALFONSO NUNEZ SUAREZ

defendant herein, willfully and knowingly did embezzle, steal, purloin, and knowingly convert to his own use and benefit money and property of the United States having value of more than \$1,000, to wit: Social Security Administration (“SSA”) disability benefits to which he was not entitled. Specifically, Defendant obtained SSA disability benefits payments by impersonating a United States citizen J.V.F. Had Defendant disclosed his true identity, he would not have received the SSA disability benefits payments.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

(Theft of Government Property, 18 U.S.C. § 641)

Beginning in or about February 2, 2016, and continuing through on or about May 15, 2025, in the Southern District of Texas and elsewhere,

JAVIER ALFONSO NUNEZ SUAREZ

defendant herein, willfully and knowingly did embezzle, steal, purloin, and knowingly convert to his own use and benefit money and property of the United States having value of more than \$1,000, to wit: Medicaid benefits to which he was not entitled. Specifically, Defendant obtained Medicaid benefits by impersonating a United States citizen J.V.F. Had Defendant disclosed his true identity, he would not have received the Medicaid benefits.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

(Aggravated Identity Theft, 18 U.S.C. § 1028A)

Beginning in or about February 2, 2016, and continuing through on or about May 15, 2025, in the Southern District of Texas and elsewhere,

JAVIER ALFONSO NUNEZ SUAREZ

defendant herein, willfully and knowingly did use, without lawful authority, a means of identification of another person, to wit: the name, date of birth, and place of birth of J.V.F., during and in relation to a violation of 18 U.S.C. § 911 (False Representation of a United States Citizen).

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FOUR

(False Representation of a United States Citizen, 18 U.S.C. § 911)

Beginning in or about February 2, 2016, and continuing through on or about May 15, 2025, in the Southern District of Texas and elsewhere,

JAVIER ALFONSO NUNEZ SUAREZ

defendant herein, a native and citizen of Colombia, and an alien in the United States, did falsely and willfully represent himself to be a citizen of the United States by presenting a United States birth certificate in the name of J.V.F. to obtain SSA disability benefit payments and Medicaid benefits.

In violation of Title 18, United States Code, Section 911.

NOTICE OF CRIMINAL FORFEITURE

28 U.S.C. § 2461(c) & 18 U.S.C. § 981(a)(1)(C)

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the defendant,

JAVIER ALFONSO NUNEZ SUAREZ

that in the event of conviction of the offense charged in Count One or Two of this Indictment, the United States will seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Money Judgment and Substitute Assets

The United States will seek the imposition of a money judgment against each defendant. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States may seek to forfeit any other property of the defendants in substitution.

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

NICHOLAS J. GANJEI
United States Attorney

By: _____



Karen M. Lansden
Assistant United States Attorney